



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAGE 02/07

December 28th
IEPA letter to
Lindberg
Addresses RAP
for HTB

217/524-3300

ENVIRONMENTAL PROTECTION AGENCY

IND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

December 28, 2000

CERTIFIED MAIL

7099 3400 0002 1429 4332

Mr. Stephen S. Penley
Lindberg Heat Treating Company.
1975 North Ruby Street
Melrose Park, Illinois 60160

Re: 0311860011 - Cook County
Lindberg Heat Treating
ILD005071808
Log No. C-544-M-20
Date Received: August 17, 2000
SRP/Technical

Dear Mr. Penley:

This letter is in response to the August 16, 2000 Remedial Action Plan for the Heat Treating Building at the above-referenced facility that was prepared by Mr. Paul Steinburg, P.E., LSP of Mabbett & Associates, Inc. (M&A) on behalf of Lindberg Heat Treating Company Inc. (LHT). Remedial activities for contamination in the Heat Treating Building (HTB) and Gantry Building Salt Building (GB/SB) at the subject facility are being carried out under Illinois EPA's Site Remediation Program. A site layout map showing the location of these buildings within the subject facility is attached. The Illinois EPA's May 15, 2000 (Log No. 544-M-19) letter required that a Remedial Action Plan (RAP) be submitted for the HTB and GB/SB as the next step to address soil and groundwater contamination present at these units. The RAP for the GB/SB was received by Illinois EPA on November 8, 2000 and will be responded to at a later date.

On May 15, 2000, Illinois EPA approved a Remedial Objectives Report for both the HTB and GB/SB. The May 15, 2000 letter included conditions that specified or required the following for the HTB:

- Establishment of Tier 2 GROs for shallow and intermediate groundwater based upon Illinois EPA's independent evaluation.
- Approval of Tier 2 GROs based upon approval of certain ordinances to serve as an environmental institutional control for groundwater pathway exclusion.
- Removal of all DNAPL and LNAPL product to the maximum extent practicable prior to the approval of Tier 2 GROs.

GEORGE H. RYAN, GOVERNOR

Mr. Stephen Penley

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- Approval of soil ROs provided: (1) an engineered barrier and associated institutional control are established over soil contamination in the HTB extended to the 0 mg/kg contour (shown in Attachment 6 - HTB Soil Concentration Contour Map) to the May 15, 2000s letter; and (2) an institutional control is established to restrict groundwater usage on the LHT property.
- Submittal of an RAP, which outlined the proposed remedial action to be taken to achieve TACO GROs.

The subject RAP for the HTB was submitted to address two areas of soil and groundwater contamination in the HTB in the vicinity of: (1) wells M&A 104, 110, 111 and 113 where dense non-aqueous phase liquids (DNAPL), primarily trichloroethylene are present; and (2) wells M&A-2, M&A 310 and M&A 114 where light non-aqueous phase liquid (LNAPL), primarily petroleum and non-chlorinated VOCs are present. A drawing showing the location of these areas within the HTB is attached.

The RAP for the HTB at the Lindberg Heat Treat facility is hereby approved subject to the following conditions and modifications:

1. The facility has not met the requirements of 35 Ill. Adm. Code 742.805 at the Heat Treating Building relative to the development of Tier 2 groundwater remediation objectives. Specifically, 35 Ill. Adm. Code 742.805(a)(2) requires that the facility take corrective action to the maximum extent practicable to remove any free product. In addition, Attachment 1, Condition 4.a of the Illinois EPA's May 15, 2000 letter (Log No. C-544-M-19) states:

"The Illinois EPA requires the following be met regarding the groundwater contamination at the Heat Treating Building:

Prior to the use of Tier 2 GROs (Groundwater Remediation Objectives) in Condition 2 above, source removal of dense nonaqueous phase liquid from groundwater at M&A-113 and light nonaqueous phase liquid at M&A-114 shall continue until all product is removed to the extent practicable;"

Therefore, implementation of the institutional control and the approved Tier 2 GROs at the Heat Treating Building cannot be approved until such time that all free product has been removed to the maximum extent practicable as required in 35 Ill. Adm. Code 742.805(a)(2).

2. In accordance with the requirements of Attachment 1: Condition 4.b and 4.c of the Illinois EPA's May 15, 2000 letter, the facility shall continue a semi-annual sampling, analysis and reporting of groundwater conditions at the Heat Treating Building for wells M&A-5.

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M&A-103, M&A-104, M&A-105, M&A-113, M&A-114, M&A-115, M&A-119, M&A-121, M&A-122 and M&A-126 until final remediation of the unit has been achieved. In addition, the following shallow wells should be included in this monitoring and reporting program due to the presence of vinyl chloride in excess of 35 Ill. Adm. Code 742 Tier 1 levels: M&A-112, M&A-116, M&A-120, M&A-2 and M&A-107. Any sampling results that exceed the conditionally approved Tier 2 GROs for the Heat Treating Building shall be remediated.

3. The facility states in the Remedial Action Plan, dated August 16, 2000, that groundwater samples will be analyzed for halogenated VOCs by EPA Method 8010. However, Method 8010 has been removed from USEPA's Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) Third Edition, Final Update III, revised December 1996. Method 8010 has been replaced by Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors. Method 8021B must be utilized for analyzing halogenated VOCs.
4. Page 7 of the RAP for the HTB refers to Drawing L-4 as being the area subject to deed restriction and requiring maintenance of an engineered barrier. The drawing does not indicate that an engineered barrier will be maintained to the 0 contour line east of the HTB (towards Ruby Street) as required by the Illinois EPA's May 15, 2000 approval letter. LHT must resubmit a map indicating that an engineered barrier will be maintained up to the 0 contour line as an addendum to the RAP for the HTB.
5. In order to help define the effectiveness of the DNAPL and LNAPL recovery systems, the Illinois EPA requests that the estimated original volume of source in the groundwater be compared to the estimated amount of DNAPL and LNAPL removed as an addendum to the RAP for the HTB.

To summarize recovery efforts to date, LHT has stated that recovery of DNAPL at M&A 113 has yielded approximately 188 gallons of DNAPL and 990 gallons of groundwater. Recovery of LNAPL from M&A-114 is approximately 15 gallons. In addition, field reports have shown little to no product on the belt skimmer in this well for the past six months. As such, LHT proposes to remove the belt skimmer and place an oil absorbent sock in well M&A-114 to collect potential residual oil and if after three month, product does not appear, removal of LNAPL will be considered to the maximum extent possible.

6. All activities implemented to address contamination identified in this letter must be carried out in accordance with 35 Ill. Code 740.
7. To ensure the requirements of 35 Ill. Adm. Code 740.410 are met, all future submittals to Illinois EPA must contain a completed DRM-2 form.

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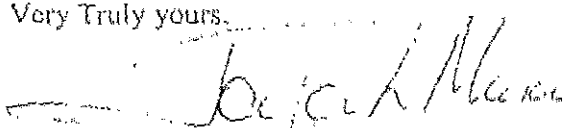
8. On November 29, 2000, Illinois EPA determined that Melrose Park, Ordinance No. 321 is an acceptable institutional control restricting groundwater usage in support of Tier 2 GROs. However that letter also pointed out that DNAPLS and LNAPLS present in the vicinity of the HTB and the GB/SB must be removed to the maximum extent practicable to meet the proposed Tier 2 GROs.

Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35 day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Practice Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding this letter, please contact Karen Nachtwey at (217) 524-3273. For questions regarding groundwater issues please contact Paula Stine at (217) 524-3861.

Very Truly yours,


Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

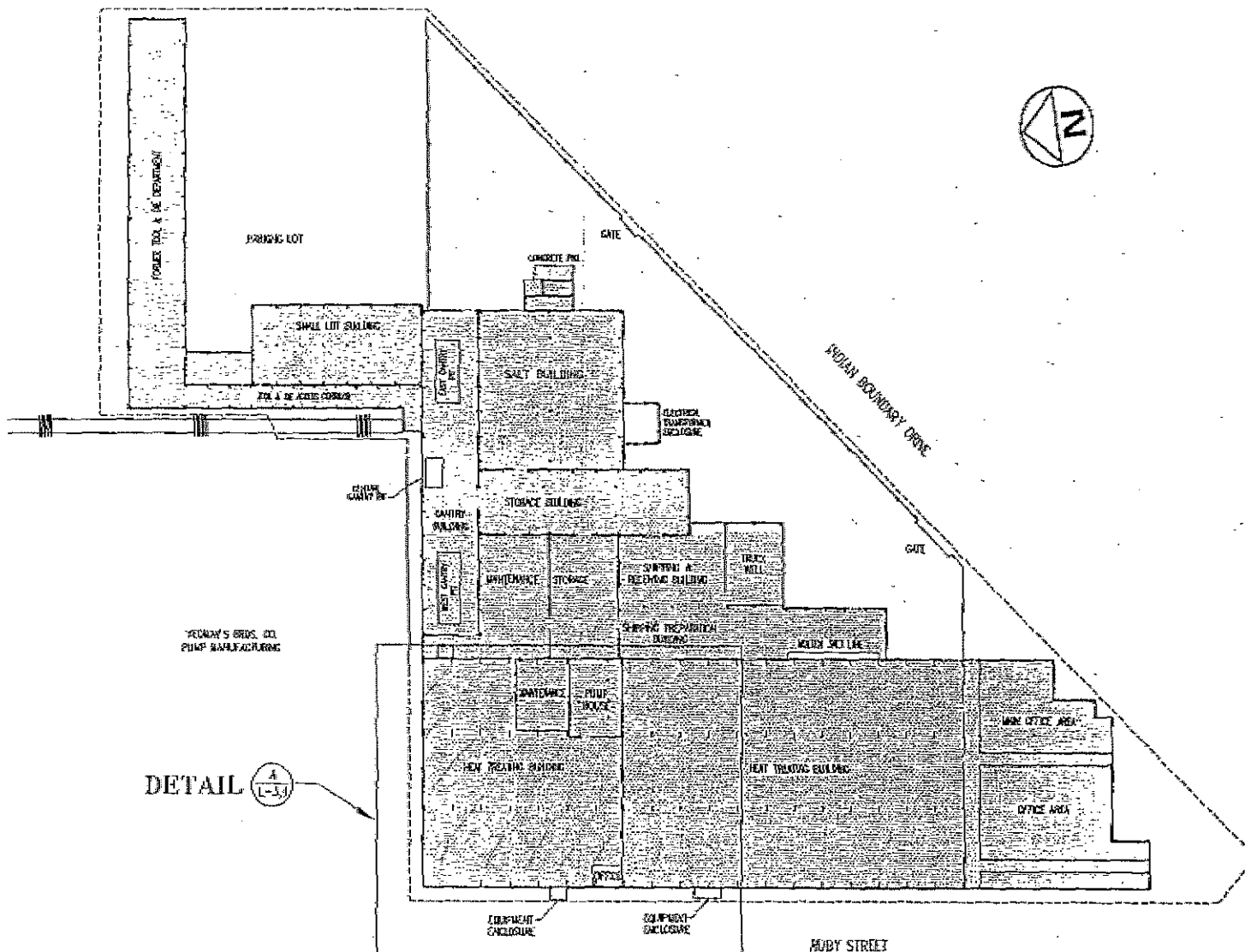
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WPS JLM

Attachments: Site Layout Map, Lindberg Heat Treat
Layout of Heat Treat Building, Lindberg Heat Treat

cc: Mahbett & Associates, Inc. - Paul D. Steinberg, P.E., LSP

bcc: Bureau File
Des Plaines Region
Terri Blake Myers
Jim Moore
Paula Stine
Karen Nachtwey



NOTES:

1. THE INFORMATION ON THIS PLAN IS BASED ON A PLAN
 SUBMITTED LINDBERG CORPORATION, 1415 NORTH RUBY STREET,
 MELROSE PARK, ILLINOIS BY MURPHY & MCLENNAN, INC.,
 PROPERTY LOSS PREVENTION DEPT. DATED MARCH 3, 1988
 AND FIELD OBSERVATIONS BY IAPA PERSONNEL. ALL LOCATIONS
 AND PROPERTY LINES ARE APPROXIMATE.

LEGEND:

- PROPERTY LINE
- - - SUPPORTING COLUMN
- - - SUPPORTING COLUMN
- OPEN LINE JUNCTION
- AND SLING
- AREA OF FACILITY BUILDING FINISHED WITH
POURED CONCRETE-SLAB FLOOR

SCALE:



DETAIL



Site Layout Map
 Lindberg Heat Treating

LINDBERG HEAT TREATING CO. MELROSE PARK, ILL. Maltbrett & Associates, Inc.	SITE PLAN SCALE: 1"=100'-0" DR BY: DJW DATE: 5/1/09	DRAWING PROJECT
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NOTES:

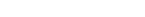
1. MONITORING WELL LOCATIONS ARE BASED ON FIELD MEASUREMENTS TAKEN BY M&A PERSONNEL.
2. ALL CONCENTRATION CONTOURS ARE APPROXIMATE BASED ON LIMITED DATA POINTS.
3. DIAGRAM TAKEN FROM A PREVIOUSLY GENERATED M&A REPORT.

LEGEND

MONITORING WELL LOCATION



BORING LOCATION



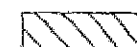
PROPERTY LINE

40,000 $\mu\text{g}/\text{kg}$

CONTOUR INTERVAL



SUPPORT COLUMN



AREA OF SOIL CONTAMINATION IN
HEAT TREATING BUILDING THAT IS
TO DEED RESTRICTION IMPELLEN
MAINTAIN THE EXISTING ENGINEER
BARRIER (CONCRETE-SLAB FLOOR)



AREA OF FACILITY BUILDING FLOOR
POURED CONCRETE-SLAB FLOOR

RUBY STREET

SCALE:

Layout of Heat Treating Building
Lindberg Heat Treating

LINDBERG HEAT TREATING CO.
MURSE PARK I.



Mabbett & Associates, Inc.
Environmental Consultants

SITE PLAN DETAIL "A"
AREA SUBJECT TO INSTITUTIONAL
CONTROLS

SCALE: 1"=40'-0"

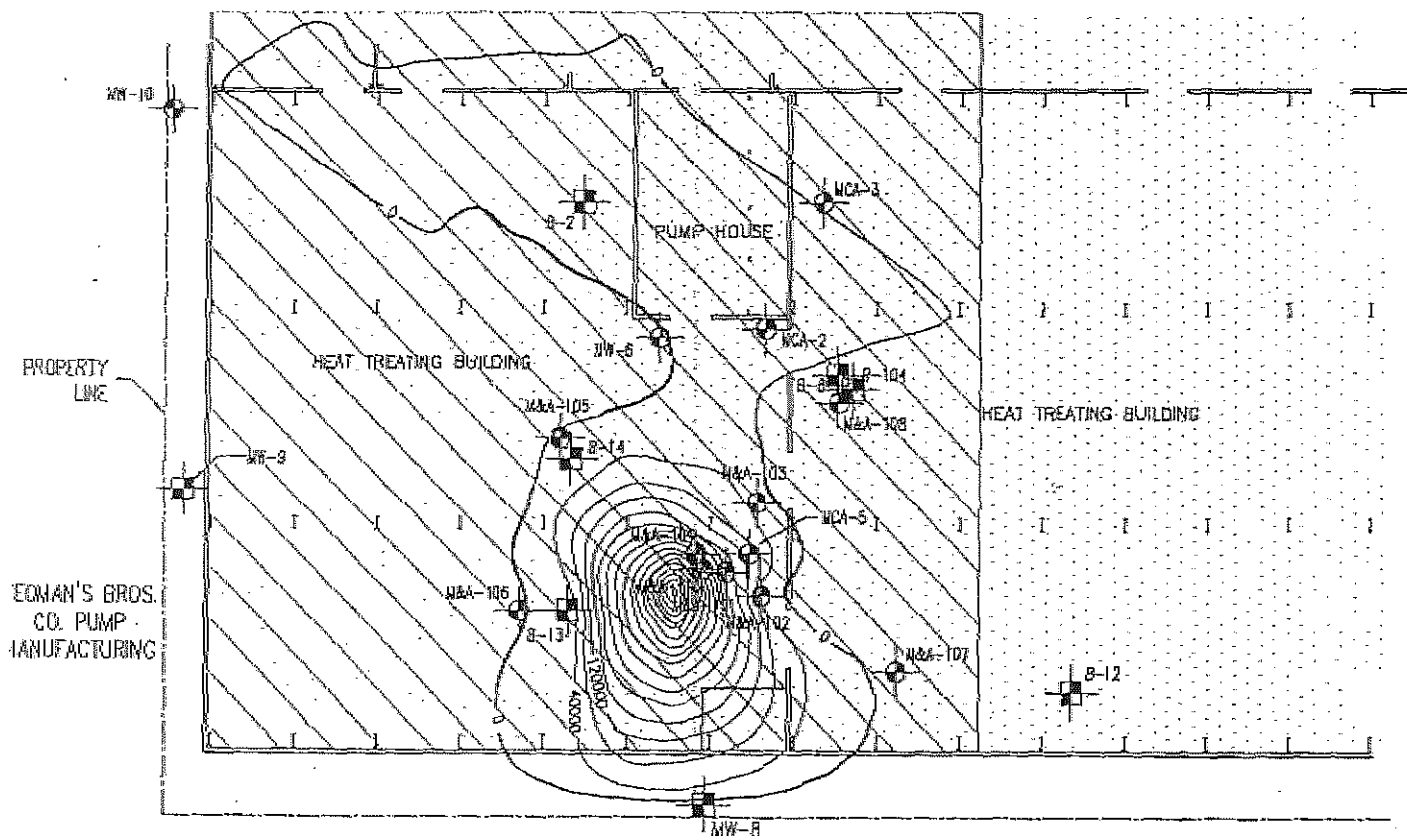
DR BY: DJA

DATE: 8/10/09

AP BY: EDC

DRAWING

PROJECT



EDMAN'S BROS.
CO. PUMP
MANUFACTURING

